

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
IN ADMIRALTY

CASE NO. 0:23-CV-61616-AHS

CENTURY BANK,

Plaintiff,

v.

M/V SUMMER 69, a 2003 130' Westport Motor Yacht Official No. 1143060, along with her boats, engines, boilers, tackle, equipment, apparel, furnishings, freights, and appurtenances, etc. *in rem*,

and

M/V 689, a 2016 42' Scout 420 LXF Official No. 1261594, along with her boats, engines, boilers, tackle, equipment, apparel, furnishings, freights, and appurtenances, etc. *in rem*,

Defendants.

DECLARATION OF JINEANE MCMINN
IN SUPPORT OF CENTURY BANK'S BILL OF COSTS
(Electronically Filed)

Pursuant to 28 U.S.C. § 1746, the undersigned, Jineane McMinn, states the following:

1. I am an attorney of the law firm of Miller Hahn, PLLC, 320 1st Street North, Suite 609, Jacksonville, Florida 32250. I am one of the attorneys with Miller Hahn, PLLC representing Plaintiff, Century Bank, in the above-styled action, and its sole attorney in

Florida. Miller Hahn, PLLC has two other offices: 2660 West Park Drive, Suite 2, Paducah, Kentucky 42001 and One Canal Place, 365 Canal Street, Suite 860, New Orleans, Louisiana 70130.

2. I make this Declaration from facts and matters within my personal knowledge and from the records of Miller Hahn, PLLC maintained in the ordinary and regular course of its business.

3. I am a licensed attorney and member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida.

4. In the above-styled action, on May 7, 2024, the Court entered Final Judgment [ECF No. 38] against the M/V SUMMER 69, a 2003 130' Westport Motor Yacht Official No. 1143060, along with her boats, engines, boilers, tackle, equipment, apparel, furnishings, freights, and appurtenances, etc. *in rem* and Defendant M/V 689, a 2016 42' Scout 420 LXF Official No. 1261594, along with her boats, engines, boilers, tackle, equipment, apparel, furnishings, freights, and appurtenances, etc. *in rem* (collectively "Defendant Vessels"), which establishes "[f]inal Judgment is entered in favor of Plaintiff Century Bank" due to the "Court's Order May 7, 2024 GRANTING Plaintiff's Motion for Summary Judgment" [ECF No. 37].

5. The Order Granting Plaintiff's Motion for Summary Judgment [ECF No. 37], establishes "Century Bank is entitled to an award of such court costs."

6. I have personally reviewed the Bill of Costs, and it is true and correct to the best of my knowledge and belief.

7. The costs set forth in the Bill of Costs have been incurred by Century Bank in the case, and the services for which the costs have been incurred were actually and necessarily performed.

8. To initiate litigation, Century Bank incurred a clerk of court filing fee of \$402.00; the receipt is attached as Exhibit 1.

9. Pursuant to Local Admiralty Rule C(8), proper notice of the above-styled action was served upon the known owner of the M/V Summer 69 and the M/V 689 as well as any other known entity that may claim a possessory interest in the Defendant Vessels [ECF No. 20]. Notice was sent to Marine Biology Research for the M/V Summer 69, to Marine Biology Research for the M/V 689, and to Ryan Boone for the M/V Summer 69. Notices were sent via Federal Express; the receipts totaling \$157.88 are attached hereto as Exhibit 2.

10. Pursuant to Local Admiralty Rule C(4), Century Bank was required to publish a Notice of Action in the local business newspaper. Out of an abundance of caution, Century Bank published the Notice of Action in both the Broward Daily Business Review and the Miami Dade Business Review. The costs from the publisher, ALM, totaled \$220.30; the invoices are attached hereto as Exhibit 3.

11. The above-styled action required Century Bank to obtain abstracts of title for the Defendant Vessels from the United States Coast Guard National Vessel Documentation Center to ascertain the known owner of the M/V Summer 69 and the M/V 689 as well as any other known entity that may claim a possessory interest in the Defendant Vessels. The receipts for \$75.00 are attached hereto as Exhibit 4.

12. The U.S. Marshal's Service incurred \$6,561.66 in costs as set forth in the USMS Civil Process Worksheet sent to me by Ms. Hady of the U.S. Marshal's Service, attached hereto as Exhibit 5.

Pursuant to Local Rules 7.1(a)(3) and 7.3(c), prior to filing this motion, the undersigned counsel for Century Bank certifies to have conferred with counsel for the Defendants by email on September 13, 2024; counsel for Defendants did not respond.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 23, 2024.

MILLER HAHN, PLLC

By: /s/ Jineane McMinn

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Attorneys for Plaintiff, Century Bank

CERTIFICATE OF SERVICE

I hereby certify that I have this the 23rd day of September, 2024, electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to the following:

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Attorney for In Rem Defendants

/s/ Jineane McMinn
Attorney for Plaintiff, Century Bank